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**Cc:** [Smith, Judy](#)  
**Subject:** Courtesy review Oregonian response due to reporter immediately!  
**Date:** Thursday, February 11, 2016 3:41:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Hi Jennifer and Nina:

Here's what we're planning to send to Rob Davis in about 20 minutes for your awareness:

To clarify, the Clean Air Act Title V permit program does not apply to art glass facilities such as Bullseye Glass in Portland. This size of facility is regulated under the state permitting program.

EPA and ODEQ work together to ensure that the monitoring, permitting and review under the Clean Air Act are sufficient to protect air quality and people's health. EPA works with ODEQ to identify the priority work that is needed to accomplish the statutory requirements in the Clean Air Act. The Title V permit program is a fee based program by design, and ODEQ must collect the funds necessary to administer the program. EPA periodically reviews the Title V program to assess whether sufficient funds are being collected to manage to program. EPA and DEQ also collaborate regarding the monitoring network needed for implementation of the National Ambient Air Quality Standards (NAAQS).

Consistent with the Clean Air Act and the implementing regulations, Title V permits are periodically revised to ensure they include all applicable requirements. Such revisions are in addition to the five-year renewal process. Title V permits are often administratively extended beyond their expiration date and the permits remain in effect. Facilities with administratively extended permits must continue to meet the limits of their permits until the permits are reviewed and renewed.

EPA is scheduled to complete a Clean Air Act Title V permit program review for Oregon this year. The two reports you referenced are compliance/enforcement related reviews, called the State Review Framework, which are separate from the Title V program review. The current report for the State Review Framework has been drafted and is now under review. The State Review Framework is a standard review of state compliance and enforcement programs and it has a Clean Air Act component.

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